The Chemours Company FC, LLC
910-678-1213
22828 NC Hwy 87 W
Fayetteville, NC 28306-7332

VIA EMAIL

January 29, 2018

Mr. Trent Allen
NC DEQ Division of Water Resources
225 Green Street
Suite 714
Fayetteville, NC 28301

RE: Notice of Potential Leak of HFPO Dimer Acid
NPDES Permit No. NC0003573
Chemours Company-Fayetteville Works
Bladen County

Dear Mr. Allen:

The Chemours Company FC, LLC ("Chemours") hereby notifies the Department of Environmental Quality ("DEQ") of a spill that was contained in rocks and dirt at the Fayetteville Works on January 25, 2018 that may have involved a small quantity of HFPO Dimer Acid. As explained further below, Chemours is making this report regarding HFPO Dimer Acid (i) even though the incident did not result in the exceedance of any applicable reportable quantity, (ii) even though this report is not required by any applicable permit or regulation, but (iii) in the interests of cooperation and transparency given DEQ's ongoing focus on the handling of HFPO Dimer Acid at the Fayetteville Works. In that regard, Chemours conservatively estimates that the total mass of HFPO Dimer Acid that may have been included in the liquid spilled was approximately 0.00006 pounds to the rocks and dirt. Based on visual observation, none of the liquid spilled reached the stormwater ditches or public waters.

Please find below a summary of the incident, the remedial steps undertaken, and an explanation of the estimated quantity of the leak. Please note that Chemours continues to investigate this incident and will supplement or revise this notice as necessary. Chemours also plans to submit a separate report of this incident under its Hazardous Waste Management Permit No. NCD047368642-R2-M3 as the pH of the liquid spilled was 14.

Chemours continues to recommend that DEQ and Chemours discuss further reasonable parameters around reporting leaks or spills that involve (or may involve) HFPO Dimer Acid and its chemical precursors given the absence of any applicable regulatory or permit guidance on reporting such leaks.

Summary of Leak

On January 25, 2018, at 3 PM, an area technician observed that the dike drain that supported the Cell Lab salt and sodium thiosulfate totes was filling up to the level of the grating that supports the totes (but not overflowing outside of the dike). The area technician contacted a maintenance technician for support. As part of troubleshooting the issue, the area and maintenance technicians removed the grating, in an attempt to better access the drain to try to use a drain cleaning tool to unclog the drain. In the process of removing the grating, approximately 1 gallon (8 pounds) of liquid (pH 14) splashed onto the concrete pad in front of the dike. The spilled liquid dribbled down to the curb on to the rocks and dirt. The spilled liquid was Cell Lab effluent, which contains water, sodium hydroxide, sodium chloride, sodium sulfate, and sodium thiosulfate, and may also contain small amounts of HFPO Dimer Acid.

Summary of Remedial Steps Undertaken

Immediately following the incident, all of the rocks and dirt that were exposed to the spilled liquid were removed and collected in a drum. This procedure was undertaken until a neutral pH was confirmed in the area. The concrete pad and area were then sprayed with vinegar and cleaned with absorbent pads. Based on visual observation, no liquid reached the stormwater ditches or public waters.

At the time of this incident, the facility already had plans to construct a permanent pipe for automatically pumping Cell Lab effluent to the Waste Tank Farm for off-site disposal. As a result of this incident, in order to avoid the possibility of another drain backup, the facility plans to install an interim pipe for sending Cell Lab effluent to an interim pumping station. This set-up will be used until the permanent system is ready.

Estimate of Amount of HFPO Dimer Acid in the Leak

Based on visual observation, facility personnel estimated the total volume of spilled liquid at approximately 1 gallon (8 pounds). The highest value of HFPO Dimer Acid ever measured back in July 2017 in the Cell Lab Effluent was used to calculate the potential amount of HFPO Dimer Acid that may have been included in the spilled liquid here. Using that calculation methodology, the mass of HFPO Dimer Acid that may have been included in the spilled liquid would have been approximately 0.00006 pounds.

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Chemours continues to investigate this incident and will supplement or revise this notice as necessary. In addition, Chemours continues to provide DEQ the results of Chemours' recurring Outfall 002 sampling. Please note that, during the next rain event, it may be difficult to estimate the extent (if any) that this spill may influence the forthcoming Outfall 002 sample results, as opposed to the fluctuations in Outfall 002 sample results Chemours has observed (and shared with DEQ) during other rain events.

If you have any questions or request additional information, please contact me at christel.e.compton@chemours.com or (910) 678-1213.

Sincerely,

Christel Compton
Program Manager

CC (via email):

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